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**From:** Yalung, Michelle [Michelle.Yalung@meritenergy.com]  
**Sent:** 1/4/2021 8:19:40 PM  
**To:** Brown, Christopher [Brown.Christopher.T@epa.gov]  
**Subject:** RE: RE: Curtis Formation Aquifer Exemption in Hamilton Dome

**Flag:** Follow up

Hi Chris,

No problem – I have done that too. Things get busy. Haha!

Thank you so much for this information.

Best regards,

**Michelle Yalung**

Regulatory Analyst | South Rockies | Merit Energy Company  
13727 Noel Rd. Suite 1200 | Dallas, TX. 75240  
o: 972.628.1441 | f:972.628.1809  
[michelle.yalung@meritenergy.com](mailto:michelle.yalung@meritenergy.com)



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**From:** Brown, Christopher <Brown.Christopher.T@epa.gov>  
**Sent:** Monday, January 4, 2021 12:20 PM  
**To:** Michelle.Yalung@meritenergy.com  
**Subject:** RE: Curtis Formation Aquifer Exemption in Hamilton Dome

Michelle,

Sorry for the late follow-up, I had drafted a response before the holidays but apparently never sent it. The aquifer exemptions you referenced are area exemptions granted as part of an existing secondary recovery project at primacy of the UIC Program for the Wyoming Oil and Gas Conservation Commission (WOGCC) in 1983. The limited information I was able to find indicated that the aquifer exemption included the secondary recovery project for the Hamilton Dome Field in its “present areal extent”, which would have been at the time of the primacy application.

If Merit does move forward with a permit application for a well in the Hamilton Dome Field, the Class II permitting would be handled by the WOGCC since it is located outside of the Wind River Indian Reservation, where EPA directly implements the UIC Program. I was on a call with Joe Scott of the WOGCC for another project, and I gave him a heads up that you may be contacting him regarding a Class II permit in the Hamilton Dome Field.

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**Chris Brown, P.G.**  
Physical Scientist  
U.S. EPA Region 8, UIC Section

8WD-SDU | 1595 Wynkoop Street | Denver, CO 80202  
Office: (303) 312-6669

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**From:** Yalung, Michelle <Michelle.Yalung@meritenergy.com>  
**Sent:** Thursday, December 10, 2020 12:37 PM  
**To:** Brown, Christopher <Brown.Christopher.T@epa.gov>  
**Subject:** RE: Curtis Formation Aquifer Exemption in Hamilton Dome

Hi Chris,

No problem, I too having been doing some juggling on my end. No rush, I understand that this will take some digging around.

Best regards,

**Michelle Yalung**

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**From:** Brown, Christopher <Brown.Christopher.T@epa.gov>  
**Sent:** Friday, December 4, 2020 11:44 AM  
**To:** Yalung, Michelle <Michelle.Yalung@meritenergy.com>  
**Subject:** RE: Curtis Formation Aquifer Exemption in Hamilton Dome

Hi Michelle,

Sorry for the delayed response, I've been juggling a number of other responsibilities with deadlines. I'm looking into your question now, and I'll try to get back to you by mid-next week, as I may have to confer with some other folks in the section regarding these historical AEs.

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**Chris Brown, P.G.**

Physical Scientist  
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**From:** Yalung, Michelle <Michelle.Yalung@meritenergy.com>  
**Sent:** Monday, November 30, 2020 9:39 AM

To: Brown, Christopher <Brown.Christopher.T@epa.gov>  
Subject: Curtis Formation Aquifer Exemption in Hamilton Dome

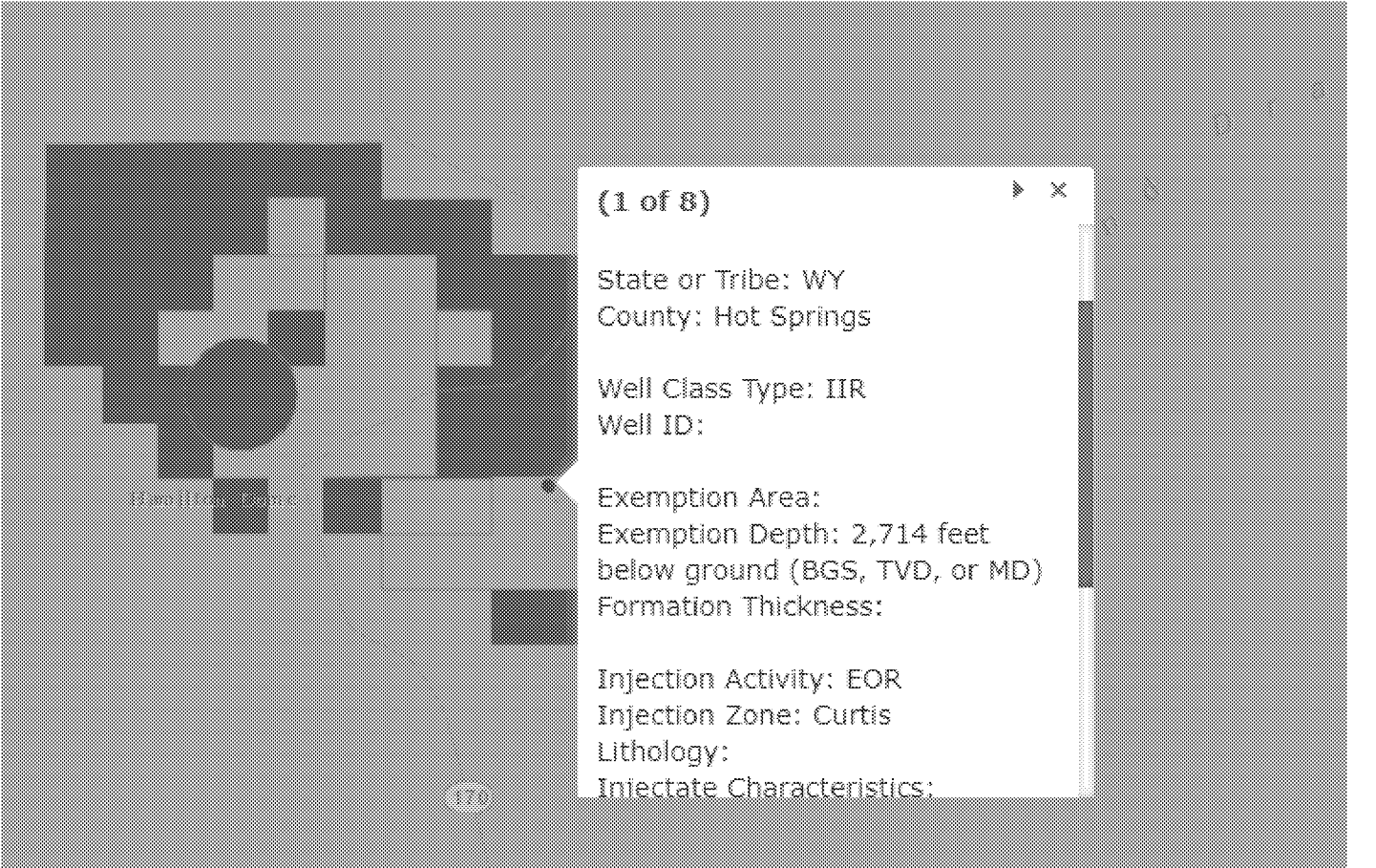
Good morning Chris,

Thank you for your phone call last Wednesday. It was very informative and helped to answer many of the questions I had on the two wells we are interested in permitting.

As mentioned, I would like to look into Exemption ID: 8\_4041 and if available, any other exemptions for the Curtis in Hamilton Dome. You said you may have access to a larger tracking mechanism for preexisting UIC wells before the UIC program was put into place.

Below please find everything I was able to find on Placer 10C. This is the Curtis AI well Merit has in Hamilton Dome. We would like to determine whether the Curtis exemption goes beyond the well and if so, how far?

ID						Geology			Approval and QA		
Region	Number	ID	Depth	Depth Units	Injection Zone	Formation	Lithology	Injectate Characteristic	Decision Date	Data Quality Category	
	Y					Thickness					
8	4018	8_4018		feet below	Curtis				8/17/1983	Imprecise location or several attributes missing	
8	4041	8_4041	2714	feet below	Curtis				8/17/1983	Imprecise location or several attributes missing	
8	4061	8_4061	2950	feet below	Curtis				8/17/1983	Imprecise location or several attributes missing	
8	4152	8_4152		feet below	Curtis				8/17/1983	Imprecise location or several attributes missing	



Best regards,

**Michelle Yalung**

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